



CONNECTICUT | FLORIDA | GEORGIA | MASSACHUSETTS | NEW JERSEY | NEW YORK | PENNSYLVANIA

*PLEASE SEND MAIL TO 103 EISENHOWER PARKWAY SUITE 400, ROSELAND, NJ 07068 FOR PROCESSING*

February 22, 2024

**VIA ECF UPLOAD**

Mary Kay Vyskocil, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007

**Re: J&J Empire Express, Inc. v. FedEx Ground Package System, Inc.**  
**Case No.: 1:24-cv-01200-MKV**  
**Our File No.: FXGDT-405**

Dear Judge Vyskocil:

Please accept the instant letter correspondence as the parties' joint motion pursuant to Rule 1G of Your Honor's Individual Rules for an extension of time for Defendant FedEx Ground Package System, Inc. ("FedEx Ground") to respond to Plaintiff J&J Empire Express, Inc.'s ("JEE") petition to vacate the relevant arbitration award ("Petition"). The original due date for FedEx Ground's response to the Petition is March 1, 2024. There have been no previous requests for an extension of this deadline. JEE consents to the instant request. No other deadlines have been established in this matter.

By way of brief background, the parties arbitrated a dispute in-person on July 24-27, 2023 in an American Arbitration Association proceeding titled: J&J Empire Express, Inc. d/b/a JEE v. FedEx Ground Package System, Inc. i/p/a Fed Ex Ground Package System, Inc., Number 01-22-0004-2920 ("AAA Matter"). On October 30, 2023, the Arbitrator issued an award in favor of FedEx Ground ("Award"). On January 26, 2024, JEE filed the Petition in the Supreme Court of New York, New York County seeking an order vacating the Award. FedEx Ground accepted service of the Petition on February 9, 2024. On February 16, 2024, FedEx Ground removed the matter to Federal Court. FedEx Ground now seeks additional time to prepare its response to the Petition, a request to which JEE consents.

The Parties jointly propose the following deadlines:

- March 22, 2024: Deadline for FedEx Ground to respond to the Petition
- April 8, 2024: Deadline for JEE to file a Reply in support of the Petition

The Parties thank Your Honor for her courtesies in advance.

Respectfully submitted,



CHRISTOPHER S. DEL BOVE

CDB/gg

cc: Richard Roth, Esq. (via electronic mail)